

IN THE CIRCUIT UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MALEEHA AHMAD, et al.,)	
)	
Plaintiffs,)	No. 4:17-CV-02455-RLW
)	
v.)	
)	
THE CITY OF ST. LOUIS,)	
)	
Defendant.)	

MEMORANDUM IN SUPPORT
OF DEFENDANT CITY OF ST. LOUIS' MOTION TO CONTINUE

COMES NOW defendant City of St. Louis pursuant to L.R. 7-401 and for its
Memorandum in Support of its Motion to Continue states:

Procedural History

1. On September 22, 2017, plaintiffs filed their Complaint and Motion for Temporary Restraining Order.
2. On September 28, 2017, plaintiffs filed their Motion for Preliminary Injunction, Memorandum in Support of their Motion and their Amended Complaint.
3. On September 29, 2017, defendant City of St. Louis filed its Motion to Continue the hearing set for October 5, 2017.

Argument

Plaintiffs' Amended Complaint and Motion for Preliminary Injunction arises from the protests and demonstrations related to the verdict in the Jason Stockley trial which was announced on September 15, 2017. In the three days following the verdict announcement, there were extensive protests in the City of St. Louis. Generally, the

protests were peaceful during the day, but turned violent at night in which property was destroyed and police officers were attacked. The violent protests in which criminal acts were committed resulted in the arrest of multiple individuals. Police officers have been working 12 hour shifts to provide police services during these protests.

Plaintiffs' motion deals with the tactics used by defendant's police officers to preserve the peace during the protests and with complaints of civil rights violations by individual plaintiffs against the police officers.

In order to properly respond to the allegations made against the City of St. Louis and its police officers, defendant City of St. Louis needs additional time to meet with the police commanders in charge of police policy regarding protest events and meet with command staff who were on scene of the protests regarding tactics used.

Defense counsel needs to review extensive video and radio transmissions in order to properly respond to plaintiffs' motion. These meetings are made difficult to set up due to the officer's continuing 12 hour shifts in response to the ongoing protests.

Conclusion

For good cause shown, defendant's motion to continue the October 5, 2017 hearing should be granted and for my other Order which this Court deems proper.

Respectfully Submitted,

JULIAN BUSH,
CITY COUNSELOR

By: /s/ Thomas R. McDonnell
Thomas R. McDonnell, #38336MO
Associate City Counselor

1200 Market Street
City Hall Room 314
St. Louis, MO 63103
Telephone: (314) 622-3361
Facsimile: (314) 622-4956
McDonnellT@stlouis-mo.gov
Attorney for Defendant

Certificate of Service

I hereby certify that on September 29, 2017 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Thomas R. McDonnell